

Fill in this information to identify the case:

Debtor 1 Gabriel Rodriguez-Martinez

Debtor 2 Maribel Escobar Esparza
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN DISTRICT OF WASHINGTON
(State)

Case number 19-40423-MJH

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: PennyMac Loan Services, LLC

Court claim no. (if known): 13

Last 4 digits of any number you use to identify the debtor's account: 7231

Property Address: 3307 Saint Andrews Ct NE
Number Street

Tacoma, WA 98422
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 02/01/2024
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 Gabriel Rodriguez-Martinez

First Name Middle Name Last Name

Case number (if known) 19-40423-MJH

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box.

- ☐ I am the creditor.
☐ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Lance E. Olsen
Attorney For Creditor

Date 12/27/2023

Print Lance E. Olsen, Esq.
First Name Middle Name Last Name

Title Attorney for Creditor

Company McCarthy & Holthus, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 108 1st Avenue South, Ste. 300
Number Street
Seattle, WA 98104
City State ZIP Code

Contact phone 206-596-4856

Email bknotice@mccarthyholthus.com

CERTIFICATE OF SERVICE

On 12/27/2023, I served the foregoing **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** on the following individuals by electronic means through the Court's ECF program

TRUSTEE

Michael G. Malaier
ecfcomputer@chapter13tacoma.org

DEBTORS' COUNSEL

John R Laris
john@majorslawgroup.com

Vicente O Barraza
omar@barrazalaw.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Andrei Mihai

Andrei Mihai

On 12/27/2023, I served the foregoing **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** on the following individuals by depositing true copies thereof in the United States mail at San Diego, California, enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTORS

Gabriel Rodriguez-Martinez, 3307 Saint Andrews Ct NE, Tacoma, WA 98422

Maribel Escobar Esparza, 3307 Saint Andrews Ct NE, Tacoma, WA 98422

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 12/27/2023

/s/ Hue Banh

Hue Banh